

THE NEUBERGER FIRM

ATTORNEYS AND COUNSELLORS AT LAW

TWO EAST SEVENTH STREET
SUITE 302
WILMINGTON, DELAWARE 19801-3707

WWW.NEUBERGERLAW.COM
EMAIL: INFO@NEUBERGERLAW.COM

THOMAS S. NEUBERGER, ESQUIRE
STEPHEN J. NEUBERGER, ESQUIRE
RAEANN WARNER, ESQUIRE
CHERYL A. HERTZOG, ESQUIRE*

PHONE: (302) 655-0582
FAX: (302) 655-9329

*(Licensed in PA and NJ only)

February 15, 2008

Via CM/ECF Filing

The Honorable Mary Pat Thyng
United States District Court
District of Delaware
844 King Street
Wilmington, DE 19801

RE: **Riddell v. Gordon, et al.**, C.A. No. 04-1201-***-MPT

Dear Judge Thyng:

In response to the Court's inquiry at the February 11, 2008 teleconference, the ten most relevant cases cited in plaintiff's brief are as follows:

- Phillips v. County of Allegheny, – F.3d –, 2008 WL 305025 (3d Cir. 2008) (motion to dismiss pleading standards under Fed.R.Civ.P. 8 and 12).
- Hall v. Pa. State Police, 570 F.2d 86, 89 (3d Cir. 1978) (pleading requirements in civil rights complaints).
- Buckhead America Corp. v. Reliance Capital Group, Inc., 178 B.R. 956, 961 (D.Del. 1994) (novel theories of law).
- Stellmaker v. DePetrillo, 710 F.Supp. 891, 892 (D.Conn.1989) (First Amendment union association).
- Fuerst v. Clarke, 454 F.3d 770, 774 (7th Cir. 2006) (First Amendment union association).
- Shefcik v. Village of Calumet Park, 2007 WL 3334329, *4-5 (N.D.Ill. Nov. 7, 2007) (First Amendment union association).
- Bennis v. Gable, 823 F.2d 723, 733 (3d Cir. 1987) (First Amendment political

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association, free speech retaliation and qualified immunity).

- Navarro v. Coons, 2007 WL 2683824, *5-6 (D.Del. Sept. 7, 2007) (First Amendment political association).
- Adkins v. Bd. of Educ. of Magoffin County, Kentucky, 982 F.2d 952, 956 (6th Cir. 1993) (First Amendment intimate association).
- Hope v. Pelzer, 536 U.S. 730, 739-48 (2002) (Qualified immunity).

I am at the Court's disposal to address these matters further.

Respectfully Submitted,

/s/ Stephen J. Neuberger

Attorney for Plaintiff

cc: All Counsel (via CM/ECF)

Riddell \ Letters \ Thyng.03